



Florida Bankers Association Political Action Committee

214 South Bronough Street
Tallahassee, FL 32301
904/224-2265
904/224-2423 (FAX)

FEDERAL ELECTION
COMMISSION
MAIL ROOM

MAR 18 | 39 PM '96

March 13, 1996

Jennifer K. Wall
Reports Analysis Division
Federal Election Commission
999 East Street Northwest
Washington, D.C. 20463

Re: C00012484

Dear Ms. Wall:

This letter is in response to your correspondence received by the Florida Bankers Association on Thursday, March 7, 1996. Per your letter, the Florida Bankers Association's PAC, Florida BankPac, has exceeded the campaign contribution limit to America's Community Bankers PAC (ACB PAC) in the amount of \$5,000. Florida BankPac made this contribution in September, 1995.

Per my conversation with you, this error occurred because the Florida Bankers Association and the Tennessee Bankers Association, in addition to 32 other state associations, are affiliated based on their affiliation with the American Bankers Association. Therefore, all contributions to outside or non-affiliated PACs must be monitored by these 33 state associations in order to avoid exceeding the total limit of \$5,000.00 to a non-affiliated PAC. A \$5,000.00 contribution made by the Tennessee Bankers Association in March 1995 to ACB PAC, in addition to Florida BankPac's contribution, resulted in this overage.

Florida BankPac was unaware of this affiliation, as was the American Bankers Association.

You suggested the way to resolve this error is to have ACB PAC return the \$5,000.00 contribution to Florida BankPac. In turn, Florida BankPac may then reissue the contribution to ACB PAC and designate it for 1996, if no other affiliated PAC makes a \$5,000.00 contribution this year.

I spoke with Marti Sworobuk, PAC Director, ACB PAC, regarding this overage and ACB PAC intends to fully cooperate in order to resolve this issue.

Florida BankPac makes every effort to comply with all federal laws which regulate PACs. We apologize for any inconvenience this error may have caused.

Sincerely,

Pamela E. Gay
Secretary/Treasurer

SPONSORED BY THE FLORIDA BANKERS ASSOCIATION

All contributions received from personnel of banks which have not granted prior permission to solicit, or from non-exempt employees of those banks which have granted prior permission to solicit, will be deposited to the State Fund. FLORIDA BANKPAC is administered by the Florida Bankers Association. Individual contributions will be reported to the Division of Elections Office of the Secretary of State, Tallahassee, Florida. A report of individual contributions in excess of \$200 will be filed with and is available for purchase from the Federal Election Commission, Washington, D.C.

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10. Working Capital means:

-Records at the Commission indicate that your committee and your affiliates may have made contributions which exceed the limits set forth in the Act (pertinent portions attached). 2 U.S.C. §441a(a) precludes multicandidate committees and their affiliates from making contributions to another political committee which, when combined, exceed \$5,000 per year.

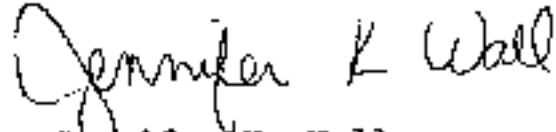
Although the Commission may take further legal action concerning the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

DCB
 can remove
 & we can
 the same
 again for 96

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Jennifer K. Wall
Reports Analyst
Reports Analysis Division

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